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15 Attorneys for Plaintiff

16 **IN THE UNITED STATES DISTRICT COURT**  
17 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**  
18 **WESTERN DIVISION**

19 **David Varas,**

20 **Plaintiff,**

21 **v.**

22 **DIRECTV, LLC,**

23 **Defendant.**

Case No. 16-cv-1395 SVW-AS

**NOTICE OF PLAINTIFF'S  
OPPOSITION TO DEFENDANT  
DIRECTV, LLC'S MOTION FOR  
SUMMARY ADJUDICATION  
REGARDING FLSA CLAIMS AND  
DAMAGES**

**Hon. Stephen V. Wilson**

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25 **TO: THE CLERK OF THE COURT AND ALL PARTIES AND**  
26 **THEIR RESPECTIVE COUNSEL:**

27 **PLEASE TAKE NOTICE** that on August 9, 2017, the plaintiffs in this and  
28

1 the following related cases:

2 *Paul Guzik v. Directv, LLC*; Case No. 2:16-cv-01967  
3 *Armando Solis Juarez v. Directv, LLC*, Case No. 5:16-cv-00400  
4 *Jeffrey Kidd v. Directv, LLC*, Case No. 2:16-cv-01506  
5 *Canh Le v. Directv, LLC*, Case No. 2:16-cv-01369  
6 *Jeremy Lasater v. Directv*, Case No. 2:16-cv-01373  
7 *Mendamar Lkhagvadorj*, Case No 2:16-cv-01502  
8 *Henry Trujeque v. Directv, LLC*, Case No. 2:16-cv-01477  
9 *David Varas v. Directv, LLC*, Case No. 2:16-cv-01395  
10 *Jamie Nault v. Directv, LLC*, Case No. 2:16-cv-05721

11 filed their oppositions to Defendant DIRECTV, LLC's Motion for Summary  
12 Adjudication regarding FLSA Claims and Damages (*Le* Dkt. 85). DIRECTV filed  
13 an identical set of motion papers in all of the related cases. Accordingly, in the  
14 interests of judicial economy and efficiency, and pursuant to the Court's In  
15 Chambers Order Setting Schedule (*Le* Dkt. 74 at 1), Plaintiffs filed only one set of  
16 opposition papers in the *Le* case that is applicable to each of the related cases still  
17 pending before the Honorable Stephen V. Wilson, including this one.

18 Plaintiffs' opposition is based on the records in *Guzik, Juarez, Kidd, Le,*  
19 *Lasater, Lkhagvadorj, Trujeque, Varas, and Nault*, including the following  
20 documents filed in the *Le* matter: Plaintiffs' Memorandum of Points and  
21 Authorities in Opposition to Defendant's Motion for Summary Adjudication  
22 Regarding FLSA Claims and Damages; Plaintiffs' Separate Statement of Genuine  
23 Disputes in Opposition to Defendant's Motion for Summary Adjudication  
24 Regarding FLSA Claims and Damages Issues; Plaintiffs' Separate Statement of  
25 Additional Facts in Opposition to Defendant's Motion for Summary Adjudication  
26 Regarding FLSA Claims and Damages; the Declaration of J. Toji Calabro in  
27 Opposition to Defendant's Motion for Summary Adjudication Regarding FLSA  
28 Claims and Damages and all exhibits attached thereto, and such further evidence,  
arguments and briefing as may be allowed or presented at or before the hearing on  
this motion.

1 Dated: August 9, 2017

**STUEVE SIEGEL & HANSON LLP**

2  
3 By /s/ J. Toji Calabro

4 J. Toji Calabro, CA Bar No. 239950

5 George A. Hanson, *Pro Hac Vice*

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28 Attorneys for Plaintiff